

United States Government

Department of Energy

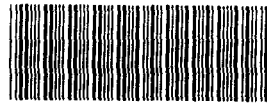
Rocky Flats Off.

## Memorandum

DUE  
DATE *as stated*  
ACTION

F. McKinley

TE. FEB 20 1990



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FEB 20 10 10 AM '90  
RECEIVED  
COMPLIANCE CONTROL

EPD MEVDP-5037

CT Surface Water Discharges From the Rocky Flats Plant (RFP)

TO: B P Warner  
General Manager  
EG&G Rocky Flats, Inc

We have received your letter of January 29, 1990, requesting \$15 million for funding of pond water zero discharge options. While we appreciate your eagerness to resolve the controversy surrounding RFO effluent, we are convinced that the various aspects of waste water management should be coordinated and properly planned. Without such integration and planning, we cannot be assured that the actions taken are consistent with NEPA or other regulatory requirements, or optimally use limited funds. Therefore, we cannot approve of your request at this time. Rather, we request that you begin the preparation of a comprehensive waste water management plan (WWMP) for RFP.

Based on recent regulatory drivers, including the draft Federal Facilities Compliance Agreement (FFCA) for past violations of National Pollutant Discharge Elimination System (NPDES) permit requirements, the recently adopted surface water quality standards, letters from the City of Westminster, the Colorado Department of Health (CDH) and the U.S. Environmental Protection Agency (EPA) addressing concerns about spray irrigation, and the Agreement in Principle, we believe the WWMP should address short, mid, and long term efforts necessary to meet all such drivers. These efforts are defined as follows:

**Short Term Efforts** Those necessary to obtain CDH approval for release of surface water. Such actions would include obtaining necessary portable treatment units, piping water back to Building 374 for further treatment, etc. Short term efforts would also include provisions for working with the cities and irrigation companies to allow for diversions should the water not meet the new standards (it is unlikely that CDH will allow for discharge of such water unless city concurrence is obtained). If possible, short term efforts would include elimination of spray irrigation.

**Mid Term Efforts** Those necessary to meet all NPDES permit requirements. Such actions would include sewage treatment plant upgrades and other actions as required in the draft FFCA Remedial Action Plan, including alternatives to spray irrigation.

**Long Term Efforts** Those necessary to develop "ideal" waste water management which includes the zero discharge study and consideration of alternatives.

Received for Addressee  
Corres. Control RFP

Date By

ADMIN RECORD


SW-A-003808

FEB 20 1990

As agreed upon by our staffs, you are requested to prepare a draft outline (with the section on short-term efforts completed and a schedule for completion of the WMMP) two weeks prior to the need for pond water release.

On February 8, 1990, you indicated the desire to meet with local community representatives to discuss water quality issues. We request that you coordinate such a meeting with Rocky Flats Office. We suggest that such a meeting include the review of the draft WWMP outline and be timed subsequent to RFO approval of that document. In order to facilitate timely RFO approval, we suggest that the WWMP outline be prepared in close coordination with RFO staff.

Please feel free to contact me or have your staff contact Mark E. Van Der Puy of my staff on extension 2473, if you have any questions.

  
Robert M. Nelson, Jr  
Manager

cc  
K McKinley, EG&G  
F Hobbs, EG&G